

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 1:24-cv-805

LARRY CHAVIS,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE UNIVERSITY OF NORTH CAROLINA –)	
CHAPEL HILL and MARY MARGARET)	
FRANK, in her individual capacity,)	
)	
Defendants.)	
)	

Plaintiff Larry Chavis and Defendants the University of North Carolina – Chapel Hill and Mary Margaret Frank, in her Individual Capacity, by and through their undersigned counsels of record, submit this Joint Local Civil Rule 5.5 Report for the filing of sealed documents.

1. Pursuant to Fed. R. Civ. P. 26(f) and Local Civil Rule 5.4(b)(1), a meeting was held on June 13, 2025, via telephone, and was attended by P. Sunny Panyanouvong-Rubeck for Plaintiff, and Jeremy D. Lindsley for Defendant.

2. Conference: The parties have discussed the issues of confidentiality raised in this case and the potential need for filing documents under seal. That discussion included the nature of any confidential documents that may be involved in the case, the possibility of using stipulations to avoid

the need to file certain documents, and the possibility of agreed-upon redactions of immaterial confidential information in filings to avoid the need for filing documents under seal.

3. The parties certify that few, if any, documents will be filed under seal. The parties agree to use the default procedures of Local Civil Rule 5.4(c). In addition, if the party filing the motion to seal is not the party claiming confidentiality, the filing party must meet and confer with the party claiming confidentiality as soon as practicable, but at least two (2) days before filing the documents, to discuss the filing party's need to include confidential information in the filing, narrowing the claim of confidentiality, or otherwise avoiding the need to file under seal. The motion to seal must certify that the required conference has occurred, and the party claiming confidentiality must file supporting materials required by LR 5.4(c)(3) within 14 days of the motion to seal.

Dated: June 13, 2025.

HKM Employment Attorneys LLP

By: /s/ Sunny Panyanouvong-Rubeck

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Attorney for Defendants

CERTIFICATE OF SERVICE

I certify that I have this 13th day of June, 2025 electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel and parties of record.